

Thursby, Kim

From: BOSEK, JOHN E <bosek.john@cleanharbors.com>
Sent: Thursday, June 17, 2021 2:15 PM
To: Epost HWRS
Cc: Curtis, Jeffery S; Desha, David A.
Subject: RE: Clean Harbors Bartow; FLD980729610; 1st Request for Additional Information (RAI)

Good afternoon all –

We have received the Departments first request for additional information and will respond as indicated. Thank you.

Safety Starts with Me: Live It 3-6-5

John Bosek

Facility General Manager

Clean Harbors Florida LLC

7001 Kilo Avenue

Bartow, FL 33830

(o) 863.519.6331

(c) 863.559.1610

(f) 863.519.6361

bosek.john@cleanharbors.com

www.cleanharbors.com



Thursby, Kim

From: Desha, David A. <desha.david@cleanharbors.com>
Sent: Thursday, June 17, 2021 2:23 PM
To: Thursby, Kim; BOSEK, JOHN E
Cc: Smith, Michell M.; Walker, Kim (Waste); 'bastek.brian@epa.gov'; 'merizalde.carlos@epa.gov'; Echevarria, Edgar; Ciaravella, Philip; Dertien, Joe; 'john@bartow-airport.com'; Black, Alexis; Pedigo, Leslie; Curtis, Jeffery S; Kruchell, Carrie L.
Subject: RE: Clean Harbors Bartow; FLD980729610; 1st Request for Additional Information (RAI)

RAI received.

Safety Starts with Me: Live It 3-6-5

David DeSha
Director Environmental Compliance
Clean Harbors Environmental Services, Inc.
Mobile: 423.413.1218
Email: desha.david@cleanharbors.com
Web: www.cleanharbors.com



From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Thursday, June 17, 2021 2:04 PM
To: BOSEK, JOHN E <bosek.john@cleanharbors.com>
Cc: Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'merizalde.carlos@epa.gov' <merizalde.carlos@epa.gov>; Echevarria, Edgar <Edgar.Echevarria@FloridaDEP.gov>; Ciaravella, Philip <Philip.Ciaravella@FloridaDEP.gov>; Dertien, Joe <Joe.Dertien@dep.state.fl.us>; 'john@bartow-airport.com' <john@bartow-airport.com>; Black, Alexis <Alexis.Black@FloridaDEP.gov>; Pedigo, Leslie <Leslie.Pedigo@FloridaDEP.gov>; Desha, David A. <desha.david@cleanharbors.com>; Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>; Kruchell, Carrie L. <Carrie.L.Kruchell@FloridaDEP.gov>
Subject: Clean Harbors Bartow; FLD980729610; 1st Request for Additional Information (RAI)

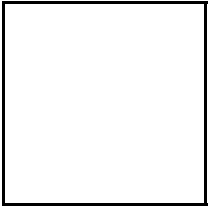
In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting





FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Interim Secretary

REQUEST FOR ADDITIONAL INFORMATION

June 17, 2021

Mr. John Bosek, General Manager
Clean Harbors Florida, LLC
7001 Kilo Avenue
Bartow, FL 33830-9504
Bosek.John@cleanharbors.com

Re: **1st Request for Additional Information (RAI)**
Operating Permit Renewal, Clean Harbors Bartow Facility
7001 Kilo Avenue, Bartow, Polk County, Florida
EPA ID Number: FL 980 729 610
Draft Hazardous Waste Operating Permit: 64247-HO-018
Draft Solid Waste Operating Permit: 64247-SO-020

Dear Mr. Bosek:

Thank you for your operating permit renewal application received on June 14, 2021 for hazardous waste and solid waste operations at the above referenced Facility. Based upon a combined Department staff review conducted between June 14 and 15, 2021, the Department and Clean Harbors have concluded that a revised application is needed.

Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please submit the document listed below. Please refer to the Department's comments (attached), for details on requested corrections and/or additions to the application.

Revised Combined Hazardous Waste/Solid Waste Permit Application for the Continued Operation of a Hazardous Waste Container and Tank Storage & Treatment Facility including Fuel-Blending, and Operation of a Solid Waste Shredder and Mixing Tub, and Implementation of HSWA Corrective Action Requirements.

Refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

Mr. John Bosek, General Manager
Clean Harbors Florida, LLC
June 17, 2021
Page 2 of 4

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 60 days of the date of this letter, or no later than August 15, 2021, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application.

You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us , with a copy to Carrie.L.Kruchell@floridadep.gov . If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/> [name of folder]. After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Carrie.L.Kruchell@floridadep.gov , alerting us that it has been posted.

If you have any questions, please contact Carrie Kruchell, P.G., by telephone at 850-245-8765 or by e-mail at Carrie.L.Kruchell@floridadep.gov .

Sincerely,

Kimberly A.
Walker

Digitally signed by Kimberly A.
Walker
Date: 2021.06.17 13:45:33 -04'00'

for

Michell Mason Smith, Environmental Administrator
Hazardous Waste Program & Permitting

Attachment: DEP Comments to the June 14, 2021 Combined Permit Application

cc (with Attachment):

Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Edgar Echevarria, DEP Headquarters, edgar.echevarria@floridadep.gov
Philip Ciaravella, P.E., DEP Headquarters, philip.ciaravella@floridadep.gov
Joe Dertien, P.E., DEP Headquarters, joe.dertien@floridadep.gov
John Helms, Executive Director-Bartow Executive Airport, john@bartow-airport.com
Alexis Black, DEP Southwest District, alexis.black@floridadep.gov
Leslie Pedigo, DEP Southwest District, leslie.pedigo@floridadep.gov
David DeSha, Clean Harbors, desha.david@cleanharbors.com
Jeff Curtis, Safety-Kleen, jeff.curtis@safety-kleen.com

Attachment: 1st RAI
Clean Harbors Florida, LLC
Hazardous and Solid Waste Operating Permits Renewal Application
Dated June 14, 2021

DEP Comments:

Part I

All edited pages must have “Revision 1” and the date of the revision in the header located at the top right corner of the page.

1. DEP Form 62-730.900(2)(a), Part I.D.2 – Please correct the NAICS code to “562211” instead of 56221.
2. Appendix I-D – Facility Description.
 - a. I-D-1.2.4, Page 3 of 24: Please correct any incorrect references on this page. For example, “Section I-C-1.7” and “I-C-1.8.1” should read “Section I-D-1.7 and I-D-1.8.1”.
 - b. I-D-1.8.1, Page 7 of 24: Please correct the reference to “Facility Site Plan” to “See Part I, Appendix I-A”.
3. DEP Form 62-730.900(2)(d), Part I.
 - a. Page 1 of 4: Include corporation papers detailing corporate compliance and health & safety policies for Clean Harbors, Inc., and provide a list of approved signers/corporate officers for Clean Harbors, LLC, e.g., a letter of authorization.
 - b. Page 2 of 4: The Department is aware that Bartow Executive Airport’s (formerly known as “Bartow Municipal Airport”) new policy is to have all paperwork brought before the Board prior to signing, and that the Board Meeting for June 2021 will be held on Monday, June 14, 2021. Please send in the necessary signed forms with signatures from the current landowner or representative, and also include a letter of authorization for the signer.
4. Table A-19.
 - a. The Facility’s permit/license from the Department of Business and Professional Regulation (DBPR) for transporting waste pharmaceuticals has an expiration date of 3/31/3023. Please edit the date accordingly.

Part II

1. **Appendix II-C – Traffic Patterns.**
 - a. Figure C-1.1 shall be updated to include locations of the Low Explosives Magazine and the solid waste shredder and mix tub, and any additional facility SWMUs or AOC that have been added to the permit as a modification in the past.
2. **Appendix II-D – Cost Estimate and Financial Assurance.**
 - a. Page 12 of 14: The closure cost estimate provided is currently under review.
3. **Appendix II-F – Facility Security Information.**
 - a. Figure 3.1: Please update this figure with the locations of the Low Explosives Magazine and the solid waste shredder and mix tub, and any additional facility SWMUs or AOC that have been added to the permit as a modification in the past.
 - b. **Appendix II-F.5 – Training Plan.**
 - i. Please prepare a detailed list of training for the Facility staff in table format.
 - c. **Appendix II-F.6 – Inspections.**
 - i. Please include the Low Explosives Magazine inspection schedule into the text of this section.
4. **Appendix II-G – Waste Code List.**
 - a. Reference to the waste codes listed on the EPA 8700-12 RCRA Subtitle C Site Identification Form submitted on 4/29/21 and comparing that list to the one in the application indicates that certain codes are missing from the EPA 8700-12 form as listed below:
 - i. D001 – D021
 - ii. Please correct and resubmit the EPA 8700-12 form.
5. **Appendix II-I – Manifest System, Recordkeeping.**
 - a. 7.1-International Shipments, Page 4 of 4:
 - i. Please change the wording in the paragraph to read “from a foreign country, the Director of the Florida Department of Environmental Protection’s (DEP) Division of Waste Management in Tallahassee, Florida, as well as the Director of the DEP’s Southwest District will be notified”
6. **Section Q – SWMUs**
 - a. **Appendix I-A, Figure BW-100-001.**
 - i. Please add a “key” to this figure listing all SWMUs/AOC by number and adding that number to the unit/area on the map.